

EUGENE ILLOVSKY (CA SBN 117892)  
MORRISON & FOERSTER LLP  
101 Ygnacio Valley Road, Suite 450  
Walnut Creek, California 94596-8130  
eillovsky@mofo.com  
Telephone: (925) 295-3300  
Facsimile: (925) 946-9912

Attorney for Defendant Tiffany Taylor

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIFFANY TAYLOR, CHRISTOPHER  
JOHNSON, JOHN MORGAN, KIM DRAGO,  
and MICHAEL DOWNEY,

Defendant.

Case No. CR 05-00651 CW

**STIPULATION AND ORDER  
EXCLUDING TIME FROM  
MARCH 1, 2006 TO APRIL 28, 2006  
FROM THE SPEEDY TRIAL ACT  
CALCULATION (18 U.S.C.  
§ 3161(H)(8)(A))**

The United States of America, by and through its attorneys, Kevin Ryan, United States Attorney for the Northern District of California, by Kirstin Ault, Assistant U.S. Attorney, and defendants TIFFANY TAYLOR, CHRISTOPHER JOHNSON, JOHN MORGAN, KIM DRAGO, and MICHAEL DOWNEY, and by their undersigned attorneys, hereby stipulate and agree that the date on which the defendants' pretrial motions shall be served and filed shall be continued from March 15, 2006 to March 27, 2006. The government's opposition shall be served and filed on April 1, 2006, and any replies shall be served and filed on April 10, 2006. A hearing on the motions shall be heard on April 17, 2006.

The parties hereby stipulate and agree that the time between March 1, 2006 and April 17, 2006 shall be excluded from the calculation of time in which the trial of the captioned matter must commence pursuant to the Speedy Trial Act.

The grounds for this exclusion are that counsel for defendants require additional time to consult with their clients in connection with the effective preparation of motions and other matters related to the defense of the case and to allow for the continuity of counsel in this case, which make it unreasonable to expect adequate preparation for pretrial proceedings or trial within the time limits established by the Speedy Trial Act. The parties agree that the ends of justice served by the exclusion of this time outweigh the best interests of the public and defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

STIPULATED:

DATED: February \_\_\_\_, 2006

/s/

KIRSTIN M. AULT  
Assistant United States Attorney

DATED: February \_\_\_\_, 2006

/s/

EUGENE ILLOVSKY  
Attorneys for Defendant Taylor

DATED: February \_\_\_\_, 2006

/s/

DAVID W. SHAPIRO  
Attorney for Defendant John Morgan

DATED: February \_\_\_\_, 2006

(defendant is fugitive)

RANDALL KNOX  
Attorney for Defendant Christopher Johnson

DATED: February \_\_\_\_, 2006

/s/

SHANA KEATING  
Attorney for Defendant Kim Drago

DATED: February \_\_\_\_, 2006

/s/

JEROME MATTHEWS  
Attorney for Defendant Michael Downey

IT IS SO ORDERED.

/s/ CLAUDIA WILKEN

3/1/06

DATED: \_\_\_\_\_

CLAUDIA WILKEN  
United States District Judge